

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

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|---|--|--|-------------------|
| 1. RESPONSE NEEDED DUE TO: | | 5. DATE OF REQUEST: | NEED RESPONSE BY: |
| <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other: | | 2/2/2017 | 02/14/17 |
| 2. REQUESTOR NAME: | | 6. COUNTY/ORGANIZATION: | |
| 3. PHONE NO.: | | Ventura County | |
| 4. REGULATION CITE(S): | | 7. SUBJECT: | |
| | | WINS Denial at Ongoing | |
| | | 8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 13-71E, ACIN I-14-14, ACIN I-27-15 | |

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Q#1 - At application the HH is not WINS eligible and is given a verbal WINS denial. The HH voluntarily reports a change mid-period. The change reported is considered VUR. Action is taken timely, WINS benefits are evaluated, and it's determined the HH is ineligible for WINS. When WINS is evaluated and denied mid-period is the WINS 1239 used to deny WINS benefits or must a verbal denial be given?

Q#2 - At application the HH is not WINS eligible and is given a verbal WINS denial. The HH complies with a SAR 7 and reports a change of income & hours, the HH is evaluated for WINS, and it's found not eligible. Is the WINS 1239 used to deny WINS benefits at SAR 7? or must a verbal denial be given?

10. REQUESTOR'S PROPOSED ANSWER:

A#1 - Yes, the WINS 1239 can be used to deny WINS benefits mid-period instead of a verbal denial. WINS eligibility is determined for the HH at application, when the HH reports a change, or at recertification regardless of whether or not the HH specifically requests WINS.

ACIN I-14-14 reads in part " The denial portion of the WINS 1239 can be used when a household specifically requests the WINS benefit (such as during a mid-period) but does not qualify for it. In this situation, use of this portion of the notice is at the county's discretion.

Continuation on page 2.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

If the household is requesting WINS benefits at initial application, mid period change reporting, SAR 7 or at recertification :

County has following 2 options:

Option 1. To use denial part of WINS 1239 if household is ineligible for WINS benefits.

Option 2. Counties can verbally deny and document case comments in the case file.

If the household is not requesting WINS:

The county's denial must be verbal only. The WINS 1239 cannot be used.

FOR CDSS USE

| | |
|----------------|-------------------------------|
| DATE RECEIVED: | DATE RESPONDED TO COUNTY/ALJ: |
| 2/2/2017 | SV 02/15/2017 |

**CALFRESH (CF) PROGRAM
REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)**

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| 1. RESPONSE NEEDED DUE TO: <input type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other: | 5. DATE OF REQUEST: 10/20/16 | NEED RESPONSE BY: 11/1/16 |
| | 6. COUNTY/ORGANIZATION: Ventura County | |
| 2. REQUESTOR NAME: | 7. SUBJECT: WINS Denial at Ongoing | |
| 3. PHONE NO.: | 8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 13-71E, ACIN I-14-14, ACIN I-27-15 | |
| 4. REGULATION CITE(S): | | |

Continuation from page 1.

The above section leads to interpretation the following:

- It's up to the county to use or not the WINS 1239 when denying the WINS benefits, and
- That the WINS 1239 denial section is used "only" when the HH is requesting WINS.

A#2 - Yes, the WINS 1239 can be used to deny WINS benefits at SAR 7. WINS eligibility is determined for the HH at application, when the HH reports a change, or at recertification.

ACIN I-27-15 question #3 reads: Can the WINS 1239 be used to deny WINS, regardless of whether or not WINS is requested by the applicant? No, The denial portion of the WINS 1239 is intended for client who request WINS mid-period and are deemed ineligible. The counties may also "opt" to provide client with a verbal denial for WINS that is then documented in the client's case file.

This ACIN also leads to interpretation that the county can use the WINS 1239 denial portion "only" when the HH has requested WINS at mid-period.

Please clarify if is up to the county to use a verbal denial, or to use the WINS 1239 when denying WINS benefits at mid-period, and at SAR 7, even if the HH is not requesting WINS.